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10 Attorneys for Defendants JOHN VARVATOS ENTERPRISES, INC.;
JOHN VARVATOS and BLOOMINGDALE'S, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

6 JIM MARSHALL PHOTOGRAPHY LLC,

17 Plaintiff,

18

VS.

19 JOHN VARVATOS, INC., a Delaware
20 corporation; JOHN VARVATOS, an
individual; and BLOOMINGDALE'S, INC., a
21 Delaware corporation,

22 Defendants.

Case No. CV11-6702-DMR

**STIPULATION TO CONTINUE
FURTHER CASE MANAGEMENT
CONFERENCE; [PROPOSED] ORDER**

Date: August 22, 2012

Time: 1:30 p.m.

**Courtroom: Courtroom 4, 3rd Floor
The Hon. Donna M. Ryu**

25 The parties, by and through their counsel, hereby stipulate that the Case Management
26 Conference, presently set for August 22, 2012 be continued for one week to August 29 at 1:30
27 P.M., or at another date convenient for the court. The basis of the request is set forth in the
28 accompanying declaration of Lawrence G. Townsend, as required by L.R. 6-2, and is as follows:

1 1. The parties completed the mediation through the court-appointed mediator on
2 July 18, have prior to and since then been diligently exchanging paper discovery, and since the
3 mediation have been working diligently to schedule depositions.

4 2. Three depositions needed to be scheduled in New York the week of August 20,
5 the only week that would work, to accommodate all the various schedules, but the Case
6 Management Conference is presently scheduled for Wednesday, August 22, 2012 at 1:30 P.M.
7

8 Accordingly, the parties respectfully request that the current Case Management
9 Conference be rescheduled for August 29, 2012 at 1:30 P.M. and that the due date of an updated
10 Joint Case Management Conference Statement be due on August 22, 2012.

11 Dated: August 14, 2012

LAW OFFICES OF LAWRENCE G. TOWNSEND

14 By: /s/ Lawrence G. Townsend

15 Lawrence G. Townsend

16 Attorneys For Plaintiff JIM MARSHALL
PHOTOGRAPHY LLC

17 Dated: August 14, 2012

DYKEMA GOSSETT LLP

20 By: /s/ S. Christopher Winter

21 S. Christopher Winter

22 Attorneys For Defendants JOHN VARVATOS
ENTERPRISES, INC.; JOHN VARVATOS and
BLOOMINGDALE'S, INC.

PROPOSED ORDER

PURSUANT TO STIPULATION OF THE PARTIES, IT IS SO ORDERED.

Dated: August 15, 2012

By:

